

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Garnet Valentine Irving

Debtor

Chapter 13

Bankruptcy No.23-12611-AMC

OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR

**AND NOW** comes Scott F. Waterman, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtor, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtor has failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtor to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan is unclear and/or incorrect as to how the secured and priority claims are to be treated and/or paid by the standing trustee.

Debtor(s) has/have failed to file all applicable Federal, State and local tax returns as required by Section 1308, in violation of 11 U.S.C. Section 1325 (a)(9).

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Scott F. Waterman

Scott F. Waterman, Esquire  
Chapter 13 Standing Trustee